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Subject: Environmental Defense comments on Resorcinol (CAS# 108-46-3)

(Submitted via Internet 11/9/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Barbara_Buchner@oxy.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Resorcinol (CAS# 108-46-3)**.

Huntingdon Life Sciences, on behalf of INDSPECT Chemical Corporation and in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data to address SIDS elements required for resorcinol.

Resorcinol is an "old" chemical that is widely used in the synthesis of adhesives and numerous other industrial and consumer products. Thus, it has been the subject of considerable research. Review of the test plan and robust summaries indicate that most of the required SIDS elements have been addressed by multiple studies. Since many of these studies were conducted some time ago, they may predate and therefore not have employed the OECD guidelines recommended by the HPV Challenge; however, our review of these data and the fact that the results are, in most cases, confirmed by multiple studies, indicate they should be acceptable.

Summaries of these studies indicate the chemical/physical properties of resorcinol have been well characterized, that it has a relatively short half-life in the environment and that it has relatively low acute or repeated dose toxicity to mammals. Though not required under the HPV Challenge, the description of chronic studies conducted on resorcinol indicate that it is not a carcinogen. Resorcinol does, however, have appreciable toxicity to aquatic organisms. According to the test plan, work is currently underway to investigate the reproductive toxicity of resorcinol, the one SIDS element not addressed by currently available studies.

We realize that it is not required information, but the appreciable toxicity of resorcinol to aquatic organisms raises some interest in more information on its production, transport, end uses that might result in its release into the environment. That is, its multiple uses assure that most of the resorcinol produced is shipped in one manner or another to various points across the nation. Thus, it would be desirable for the test plan to include some description of resorcinol production, transport and uses as well as measures taken to limit its release into the environment.

Additional comments:

1. Many of the studies described in the test plan and robust summaries are somewhat dated and were not conducted under GLP; however, the studies conducted by the NTP were conducted under GLP, a fact that should be noted.
2. Only the effective or toxic concentration determined is provided in many of the studies described in the robust summaries. The range of does tested is not provided, but should be.
3. The studies of doses necessary to inhibit movement of algae within 15 minutes described in the robust summaries are not relevant to the current submission.
4. In many summaries no information is provided for "Test Substance". Even though the purity of the chemical tested may not be known, some indication that resorcinol was the substance actually tested should be provided. That is, something like "Test Substance = Resorcinol, purity not stated", would be preferable.

In summary, all SIDS elements except reproductive toxicity have been satisfactorily addressed for resorcinol, and an appropriate study to address this element is apparently underway; thus, with the completion of the pending study this submission appears complete and will be sufficient to meet the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

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